

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: JUL 24 1991

SUBJECT: Review of the final draft Quality Assurance Project Plan (QAPP) for the US EPA Region VII support of the ATSDR Multi-State Lead Exposure Study

h FROM: *S. O. O. O. O.* Pat Van Leeuwen, Toxicologist
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TO: Glenn Curtis
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I have reviewed the final draft Quality Assurance Project Plan (QAPP) for the Environmental Protection Agency Region VII support of the ATSDR Multi-State Lead Exposure Study. I was disappointed to see that the major methodological concerns previously presented have not been incorporated into this document. To reiterate, heavy metal concentrations are not constant over time - either in biological fluids or in environmental media such as outdoor soil or indoor dust. We do not believe, in Region V, that data collected in the described manner can be used to generate a meaningful health study at the NL/Taracorp site, and we doubt that it will be appropriate to meet the ATSDR study objectives. My understanding is that Region V will prepare its own QAPP; it would be helpful to us if you could provide us with a copy of your QAPP on disk as quickly as possible and also a copy of the attachments, so that we can get an approved QAPP in time to meet the stringent sampling deadline.

I think that it should be made clear to ATSDR that the use of dissimilar QAPPs uncouples the objectives of a Multi-State study, and that these methodological differences mandate that the Region V and Region VII studies be considered as independent studies.

Specific areas in the QAPP document which are still unacceptable to Region V are highlighted below.

Page 3, Section I, objective 1. Region V will collect environmental samples from all study participant residences, rather than from a randomly selected subset as outlined here. Environmental samples will be collected in the same time period that the biological sampling is done.

Page 4, Section II-B Same as above.

Page 7, Section IV-A 1.a. and b. Same as above.

Page 9, Section IV B Environmental sampling will take place during the same time period as biological sampling.

Page 11, Section C.3.d. The plan for choosing Play Area Soil sample locations is ambiguous and requires further elaboration of the sampling location selection strategy to be used.

If you have any questions, please feel free to call me at (312) 886-4904 or Brad Bradley at (312) 886-4742.

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